

LEVINE LEE LLP

**MEMO ENDORSED**

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January 2, 2025

**Via ECF**

The Honorable Jessica G.L. Clarke  
United States District Judge – Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: Rapaport v. Epstein, 24-cv-7439-JGLC; Rapaport v. Epstein, 23-cv-6709-JGLC (Related)**

Dear Judge Clarke:

We write on behalf of Defendant Mitchell Pallaki to respectfully request that Mr. Pallaki's deadline for responding to the complaint be extended until February 13, 2025, so that it aligns with the deadline for the other defendants. Plaintiff Gideon Rapaport consents to this request.

Mr. Pallaki's current deadline for responding to the complaint is January 30, 2025. (ECF No. 12.) This is Mr. Pallaki's second request for an extension of this deadline (*see* ECF No. 11); the Court granted his prior request (*see* ECF No 12); and the parties do not have any scheduled appearances before the Court. As the Court is aware, the current deadline by which the other defendants in this action must respond to the complaint is February 13, 2025. (*See* ECF No. 22). We respectfully submit that the most efficient path forward is for all the defendants' response dates to be aligned. Accordingly, we respectfully request that Mr. Pallaki's deadline be extended to February 13, 2025 to match the other defendants' deadline.

We thank the Court for its consideration.

Respectfully submitted,

Levine Lee LLP

/s/ Steven W. Kessler

Seth L. Levine

Steven W. Kessler

Application GRANTED. Defendant Pallaki shall answer or otherwise respond to the complaint by **February 13, 2025**. The Clerk of Court is respectfully directed to terminate ECF No. 27.

cc: All Counsel of Record and *Pro Se* Plaintiff Gideon Rapaport (via ECF)

Dated: January 6, 2025  
New York, New York

SO ORDERED.

*Jessica Clarke*

JESSICA G. L. CLARKE  
United States District Judge